

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

FILED

2005 OCT 24 P 4: 01

IN RE:

Brenda M. Threatt,

Debtor.

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Chapter 13

Case No 05-11788-JSD

U.S. BANKRUPTCY COURT
AUGUSTA, GEORGIA

OBJECTION TO CLAIM

COME NOW, Brenda M. Threatt, by and through her attorney of record, Angela Williams Seymour, and file this objection to the claim filed by Estate of Brian Broderick Lane, and show this Court as follows:

1.

Debtors filed this Chapter 13 Bankruptcy on May 31, 2005.

2.

Debtors' First Meeting was held on June 28, 2005.

3.

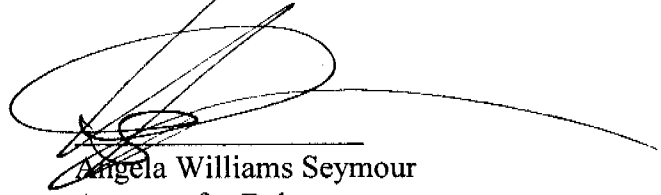
Estate of Brian Broderick Lane has filed a proof a claim for Fifty Thousand Dollars and No cent (\$50,000.00).

4.

Debtors object to this Claim in that Debtors do not owe the amount claimed by Brian Broderick Lane as the judgment was set aside in the Adversary Proceeding Case No. 05-01011-JSD see attached exhibit "A".

WHEREFORE, Debtor prays that this Claim in the amount of Fifty Thousand Dollars and No cent (\$50,000.00) to Estate of Brian Broderick Lane be disallowed.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Angela Williams Seymour', is written over a horizontal line. The signature is stylized with a large loop and a long horizontal stroke extending to the right.

Angela Williams Seymour
Attorney for Debtor
GA Bar No.: 636505

James B. Duncan, III
& Associates, P. C.
Post Office Box 211003
Augusta, GA 30917-1003
(706) 868-1968

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION**

FILED

IN RE:

BRENDA M. THREATT,

Debtor.

BRENDA M. THREATT,

Movant,

VS.

ESTATE OF BRIAN BRODERICK LANE,

Respondent.

Chapter 13
Case No.: 05-11788-JSD

2005 OCT 24 P 4: 01

U.S. BANKRUPTCY COURT
AUGUSTA, GEORGIA

NOTICE OF OBJECTION TO CLAIM

Movant has objected to your claim filed in this bankruptcy case.

Your claim may be reduced, modified or eliminated. You should read these papers carefully and discuss them with your attorney. If you do not have an attorney, you may wish to consult one.

If you have legal grounds to oppose the objection, or if you wish the Court to consider your views on the objection, you must file a written request for a hearing with the Clerk of the Bankruptcy Court before the expiration of thirty (30) days from the date stated in the certificate of service.

If you mail your request for hearing to the Court, you must mail it early enough so that it will be received within the time referenced above.

Any request for a hearing must also be mailed to the moving party and all other persons indicated in the certificate of service attached to these pleadings.

If a timely request for hearing is filed, you will receive a notice of the date, time and place of hearing.

If you or your attorney do not take these steps, the Court will decide that you do not oppose the objection to your claim and will enter an order reducing, modifying, or eliminating your claim.

Claimant has been served with a copy of the objection and a copy of this notice, and if claimant is a U.S. Government agency, the U.S. Attorney, Post Office Box 8970, Savannah, Georgia 31412 (or Post Office Box 2017, Augusta, Georgia 30903), and the Attorney General in Washington, D.C. 20530 have also been served.

DATED this 21 day of Oct., 2005.

Angela Williams Seymour

~~Attorney for Debtor~~

Georgia Bar No 636505

JAMES B. DUNCAN, III, & ASSOCIATES, P.C.

Post Office Box 211003

Augusta, GA 30917-1003

(706) 868-1968

Michael F. McHugh, Clerk
United States Bankruptcy Court
Southern District of Georgia

IN RE: Brenda M. Threat
CHAPTER 13 CASE NO: 05-11788

CERTIFICATE OF SERVICE

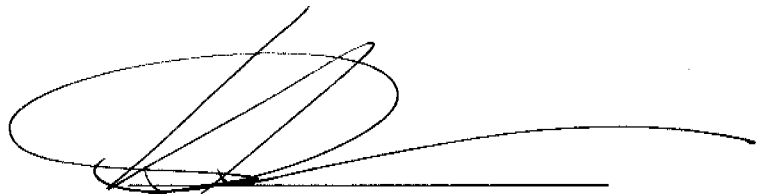
I hereby certify that I have served a copy of the within and foregoing **OBJECTION TO CLAIM and NOTICE OF OBJECTION TO CLAIM** upon the following by depositing a copy of same in the United States Mail, addressed as indicated, with adequate postage attached.

BARNEE C. BAXTER, ESQ.
CHAPTER 13 TRUSTEE
POST OFFICE BOX 2127
AUGUSTA GA 30903

ESTATE OF BRIAN BRODERICK LANE
TODD BOUDREAUX
207 N. BELAIR ROAD
EVANS, GA 30809

BRENDA M. THREATT
245 ALEX LANE
AUGUSTA, GA 30909

Dated: October 21, 2005.



Angela Williams Seymour
Attorney for Debtor/Movant
Georgia Bar No.: 636505

JAMES B. DUNCAN, III
& ASSOCIATES, P.C.
Post Office Box 211003
Augusta, GA 30917-1003
(706) 868-1968

Exhibit "A"

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

IN RE:

BRENDA M. THREATT,
Debtor

ESTATE OF BRODERICK,
BRIAN LANE
Plaintiff.

V.

BRENDA M. THREATT,
Defendant

CHAPTER 13

CASE NO.: 04-14150-JSD

ADVERSARY NO: 05-01011-JSD

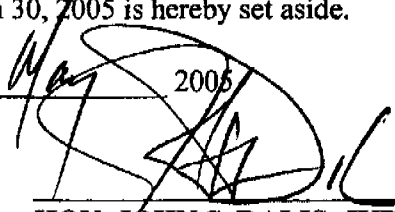
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2005 MAY 26 P 2:29
KMD
BANKRUPTCY COURT
AUGUSTA, GA

ORDER ON DEFENDANT'S MOTION TO SET ASIDE DEFAULT JUDGMENT

The Defendant's Motion to Set Aside Default Judgment of the Estate of Broderick Brian Lane having been heard and considered by this Court, it is hereby:

ORDERED, ADJUDGED AND DECREED that the Defendant's Motion is GRANTED and the Entry of Default entered on March 30, 2005 is hereby set aside.

SO ORDERED this 26th day of May 2005


HON. JOHN S. DALIS, JUDGE
U.S. BANKRUPTCY COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

Prepared and Presented By:



Brandi J. Hillewaert, for the Firm
Attorney for Defendant
Georgia Bar No. 354776
James B. Duncan, III & Associates, P.C.
Post Office Box 211003
Augusta, GA 30917-1003
(706) 868-1968

G: Debtor / Defendant - Threath
Debtor Atty - Hillewaert / Cruise / Seymour
Plaintiff - Estate of Broderick Brian Lane
Pltf Atty - Boudreaux
5/31/05
w/h
Defendant -
Def Atty -
Trustee - Wallace
U. S. Trustee - James

(12)